

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Eramet Marietta, Inc.
16705 Ohio State Route 7
Marietta, Ohio 45750**

ATTENTION:

Mark Carpenter
EHS Engineer
mark.carpenter@eramet.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Eramet Marietta, Inc (“Eramet” or “you”) to submit certain information about the facility that you own and operate at 16705 Ohio State Route 7, Marietta, Ohio (“the Marietta facility”). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (“the CAA”), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

We are requesting this information to determine whether the Marietta facility is complying with the National Emission standards for Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese at 40 C.F.R. Part 63, Subpart XXX.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Eramet to upload all required information to the secured web-link shared with

you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Patrick Miller at miller.patrick@epa.gov or 312-886-4044 to make arrangements to submit your response.

Eramet must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Eramet to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Patrick Miller at 312-886-4044.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, the National Emission standards for Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese at 40 C.F.R. Part 63, Subpart XXX, and Eramet's Title V Permit Number P0091078 issued by Ohio EPA on March 11, 2019, effective April 1, 2019.

Appendix B

Information You Are Required to Submit to EPA

Eramet must submit the following information about the Marietta facility, pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), for the time frame of January 1, 2019 to the date of this request, or as specified in the requests below:

1. Provide current diagrams of air pollution control devices and associated ventilation duct work and stack locations for all point sources of emissions, including but not limited to, MOR Process (F012), #1 Furnace (P901), #12 Furnace (P908), and #18 Furnace (P909).
2. Provide potential to emit emission calculations for each air pollutant, including hazardous air pollutants, and include supporting documentation for emission factors, performance test results, and assumptions used in the calculations, for the following sources:
 - a. Submerged arc furnaces (P901, P908, and P909), including charging, smelting, tapping, casting, and ladle raking for each furnace;
 - b. Process fugitive emissions;
 - c. MOR process (F012);
 - d. Crushing, sizing, packing system in C2P Dept. (P917);
 - e. Roadways (F001); and
 - f. Storage piles (F002).
3. Provide all written maintenance plans and standard operating procedures (SOP) manuals or other plan for each air pollution control device associated with submerged arc furnaces, metal oxygen refining processes, and crushing and screening operations, as required by 40 C.F.R. § 63.1655(b).
4. Provide the monthly inspections records of the equipment that is “important to the performance of the furnace capture systems,” as required by 40 C.F.R. § 63.1655(d).
5. Provide the following records for bag leak detection systems for each submerged arc furnace baghouse including, but not limited to:
 - a. The standard operating procedures manual; and
 - b. Records of all dates and times of all bag leak detection system alarms, if not already provided in response to Item #17 below including, but not limited to:
 - i. The time that procedures to determine the cause of the alarm were initiated;
 - ii. The cause of the alarm;
 - iii. An explanation of the corrective action taken; and
 - iv. The date and time the cause of the alarm was corrected.

6. Provide stack opacity readings, records, and supporting documentation of any air pollution control device, including but not limited to, those for the MOR Process (F012), and #1, #12, and #18 Furnaces (P901, P908, and P909).
7. Provide all shop building opacity readings, records, and supporting documentation, as required by 40 C.F.R. § 63.1625(d), from January 1, 2019 through December 31, 2020.
8. Provide all reports of the shop building capture system monitoring required under 40 C.F.R. § 63.1626(g)(1) and (2), as applicable, identification of periods when the capture system parameters were not maintained and an explanation of the corrective actions taken if not already provided in response to Item #17, below.
9. Provide all reports of the continuous parameter monitoring system (CPMS) required under 40 C.F.R. § 63.1626, an identification of periods when the monitored parameters were not maintained as required in 40 C.F.R. § 63.1626 and corrective actions taken if not already provided in response to Item #17 below.
10. Provide records of quarterly inspections of the submerged arc furnace capture systems, as required under 40 C.F.R. § 63.1626(h). This shall include, but is not limited to:
 - a. Quarterly inspection logs and/or reports;
 - b. Identification of periods when the flow rate or pressure was not maintained as required in 40 C.F.R. 63.1626(e), if not already provided in response to Item #17 below; and
 - c. Records of the output of any CEMS installed to monitor particulate matter emissions meeting the requirements of 40 C.F.R. § 63.1626(j).
11. Provide all performance tests conducted according to the requirements of 40 C.F.R. § 63.1625 for emissions units subject to emission standards in 40 C.F.R. § 63.1623 for the past five years.
12. Provide all operating parameter limits and records for operating parameters that apply to the air pollution control devices.
13. Provide the process fugitive ventilation plan as required by 40 C.F.R. § 63.1625(e)(1). Include any updated information, if applicable, that documents the equipment and operations designed to effectively capture process fugitive emissions as required in 40 C.F.R. § 63.1624(a)(1). Additionally, provide deviations reports and a list of corrective actions associated with the process fugitive ventilation plan if not already provided in response to Item #17, below.
14. Provide the outdoor fugitive dust control plan that is required by 40 C.F.R. § 63.1625(e)(2). Additionally, provide deviations reports and corrective actions associated with the outdoor fugitive dust control plan if not already provided in response to Item #17 below.

15. Provide records of the occurrence and duration of each malfunction of operation, the air pollution control equipment, or monitoring equipment as required in 40 C.F.R. § 63.1628(b)(10) if not already provided in response to Item #17 below.
16. Provide a narrative description of operational conditions at #1, #12, and #18 Furnaces (P901, P908, and P909) and the MOR Process (F012) that result in bypassing or overwhelming associated air pollution control devices such as baghouses or scrubbers. Additionally, provide the following information with respect to each bypass event: a summary of the event, its duration, any photographs or digital images of the stack or bypass stack of the air pollution control device during the event, steps operators took in response to the event, root cause of the event, and any corrective actions taken.
17. Provide the Title V annual (as applicable), semi-annual, and quarterly deviation reports from January 1, 2019, through December 31, 2019, January 1, 2020 through June 30, 2020, and July 1, 2021 through the date of this request.
18. Within 30 days of receipt of this request and until March 31, 2023, Eramet shall commence monitoring and recording the following operational information, in an electronic, unlocked Excel spreadsheet, for #1 Furnace (P901), #12 Furnace (P908), and the MOR Process (F012):
 - a. Date, start time, and end time of each applicable operation, including:
 - i. Charging,
 - ii. Tapping,
 - iii. Slag skimming,
 - iv. Casting (including alloy casting at MOR),
 - v. Metal transfer,
 - vi. MOR blowing, and
 - vii. Any time there is a condition in the furnace or MOR that causes the air pollution control device to be bypassed or abnormal emissions out of the roof monitor.
 - b. The throughput in tons of each material for each step.

Submit to EPA the above information within 30 days after the close of each calendar quarter.